

Grant Boyd

v.

Civil Case: 05-10873-RWZ

Mike Austin, et al

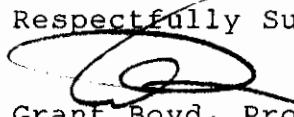
MOTION TO COMPELL DOCUMENT DISCLOSURE

Pursuant to F.R.Civ.P. 37(a) the plaintiff moves the Court to compel the Massachusetts Department of Corrections MCI Cedar Junction Superintendent John Marshall, his deputies and officials responsible for classification, mail room, phone room and IPS offices to permit inspection and allow copying of those documents and objects that were specified in the subpoena, including those provided by outside agencies that might be protected pursuant to M.G.L. Chapter 6 §§ 167-178 and Chapter 124 § 1(q).

After having conferred with Sheryl Mayor, DOC MCI Cedar Junction legal representative, on September 15, 2005 in which arrangements were made to inspect and copy requested items, she informed plaintiff that certain items requested were protected in that they were provided to the DOC by an outside agency, like Plymouth County Sheriff's Department and as such the DOC needs a Court order to allow inspection and copying to avoid being in violation of the above cited M.G.L.

For the above reasons the plaintiff moves the Court to grant plaintiff's motion to compel DOC to comply with plaintiff's subpoena to include those protected items.

Respectfully Submitted,

  
Grant Boyd, Pro-Se  
PO Box 100  
S. Walpole, MA 02071

9/19/06